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*Counsel for Highland Capital Management, L.P.,  
and the Highland Claimant Trust*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

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In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.,<sup>1</sup>

Reorganized Debtor.

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)  
) Chapter 11  
)  
) Case No. 19-34054-sgj11  
)  
)  
)  
)

**DECLARATION OF JOHN A. MORRIS IN SUPPORT OF HIGHLAND PARTIES'  
OBJECTION TO MOTION TO STAY AND MOTION TO COMPEL MEDIATION**

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<sup>1</sup> Highland's last four digits of its taxpayer identification number are (8357). The headquarters and service address for Highland is 100 Crescent Court, Suite 1850, Dallas, TX 75201.

I, John A. Morris, pursuant to 28 U.S.C. § 1746, under penalty of perjury, declare as follows:

1. I am a partner in the law firm of Pachulski, Stang, Ziehl & Jones LLP, counsel to Highland Capital Management, L.P. (“HCMLP”), the reorganized debtor in the above-referenced bankruptcy case, and the Highland Claimant Trust (the “Trust” and together with HCMLP, the “Highland Parties”). I submit this declaration (the “Declaration”) in support of the Highland Parties’ opposition (the “Opposition”) to the *Motion to Stay and Motion to Compel Mediation* [Docket No. 3752] (the “Motion”) being filed simultaneously with this Declaration.<sup>2</sup> This Declaration is based on my personal knowledge and review of the documents listed below.

2. Attached as **Exhibit 1** is a redacted version of the *Motion for Determination of the Value of the Estate and Assets Held by the Claimant Trust* [Docket No. 3382] filed under seal by The Dugaboy Investment Trust on June 30, 2022.

3. Attached as **Exhibit 2** is a true and correct copy of the *Verified Complaint for Specific Performance to Inspect and Copy Books and Records* filed in the Delaware Chancery Court on May 5, 2023 (C.A. 2023-0493)

4. Attached as **Exhibit 3** is a true and correct copy of the transcript of the hearing held on April 13, 2022 (PM Session).

5. Attached as **Exhibit 4** is a true and correct copy of the transcript of the hearing held on August 8, 2022 in Adv. Pro. No. 21-03020-sgj.

6. Attached as **Exhibit 5** is a true and correct copy of an email chain between Amy Ruhland and me dated March 15, 2023.

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<sup>2</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Opposition.

7. Attached as **Exhibit 6** is a true and correct copy of an email sent by Deborah Deitsch-Perez to me on April 30, 2023.

Dated: May 25, 2023

/s/ John A. Morris  
John A. Morris